

Commonwealth of Kentucky
Division for Air Quality
COMMENTS AND RESPONSE
ON THE DRAFT PERMIT

Comments on Draft Title V Air Quality Permit for Department of Correction, Northpoint Training Center in Burgin, KY submitted on January 30, 2009 by Steve Haney, Warden, NTC.

Draft Permit:

The facility was issued a draft permit on December 29, 2008. In reviewing the draft permit V-08-038, the facility requests the following changes:

1) EU 05 Paint Spray Booth

- a. The hours of operation per year be changed to 700 hours per year
- b. The amount of material usage should be changed to the following quantities:
 - i. Lacquer thinner 70 gallons/year (460 lbs/year)
 - ii. Lacquer 30 gallons/year (170 lbs/year)
 - iii. Vinyl sealer 25 gallons/year (138 lbs/year)
 - iv. Bromide Spray 50 gallons/year (330 lbs/year)
 - v. Bix Spray-on 10 gallons/year (10 lbs/year)
 - vi. Wiping Satin 12 gallons/year (67 lbs/year)
 - vii. Birch Spray 10 gallons/year (66 lbs/year)

2) EU 06 Carpentry Operations

- a. The amount of board feet should be 4,000 board feet/year (13,310 lbs/year)

The above changes will not change the permit type or status. We have attached the draft permit with markups and revised emission calculations for EU 05 and EU 06 based on the new hours of operations and usage for your use.

Division's response: Comment acknowledged, change made.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.